

ILLINOIS ENVIRONMENTAL PROTECTION AGENCY

1021 NORTH GRAND AVENUE EAST, P.O. BOX 19276, SPRINGFIELD, ILLINOIS 62794-9276 * (217) 782-2829

BRUCE RAUNER, GOVERNOR

LISA BONNETT, DIRECTOR

217/524-3300

October 27, 2015

CERTIFIED MAIL 7012 0470 0001 2976 8262

Ortek, Inc.

Attn: Mr. Lowell Aughenbaugh, President 7601 W. 47th Street McCook, Illinois 60525

Re:

0311740002 -- Cook County

Ortek, Inc.

ILD 000 646 786

Received: August 31, 2015

Log No. C-889 RCRA Closure

Dear Mr. Aughenbaugh:

This is in response to the August 28, 2015 RCRA Closure Plan submitted on your behalf by Andrew S. Perdue of Weaver Consultants Group. This submittal addressed closure of five hazardous waste storage tanks at the above-referenced facility located at the 7601 W. 47th Street, McCook, Illinois. A drawing showing the location of these five tanks within the facility referred to as Tanks 101, 120, 122, 132, and 146, is attached. This RCRA Closure Plan was submitted in response to the January 24, 2013 Notice of Violation from the United States EPA regarding alleged violations observed during December 9, 2011; December 14, 2011; December 21, 2011 and January 30, 2012 USEPA inspections.

The plan to complete closure of the five hazardous waste management units mentioned above is hereby approved subject to the following conditions and modifications:

- In accordance with 35 III. Adm. Code 725.213(b), all activities necessary to complete closure of the subject unit(s) must be completed within 180 days of the date of this → 4/24/16 approval letter. Illinois EPA may approve an extension of this deadline if Ortek, Inc. submits a closure plan modification request which contains information demonstrating that: (1) the closure activities will, of necessity, take longer than 180 days to complete; and (2) Ortek, Inc. has taken and will continue to take all steps necessary to prevent threats to human health and the environmental from the unit(s), including compliance with all applicable interim status requirements.
 - a. In accordance with 35 Ill. Adm. Code 725.213(c), a closure modification request for an extension of the time required to complete closure must be submitted to Illinois EPA at least 30 days prior to the expiration of the 180-day closure period.

4302 P.L. Main St., Rockford, B. 61103 (8±5)967-7760 595 S. State, Etgin, IL 60123 (847)608 3131 2125 S. First St., Champa'gn, IL 6+820 (2±7)278-5800 2009 Mail St., Collinsville, IL 62234 (6±8)346-5128 9511 Horrison St., Des Plaines, it 60016 (847)294-4000 5407 Pt. University St., Arbor 113, Peoria, it 61614 (309)693-546/2 2309 W. Main St., Suite 116, Marion, it 62959 (618)993-7200 100 W. Randolph, Suite 11-300, Chicago, it 60601 (312)814-6026

- b. The closure plan modification request for an extension of the time required to complete closure must contain a revised schedule which identifies: (1) the various tasks which must be conducted to complete closure of unit(s); (2) the estimated time frame during which the required tasks will be completed; and (3) the final date when closure will be completed.
- 2. In accordance with 35 III. Adm. Code 725.215, when closure is complete a certification must be submitted to Illinois EPA by the owner/operator and an independent professional engineer that the hazardous waste management units at the facility have been closed in accordance with the specifications in the approved closure plan. This certification should be received at the Illinois EPA within sixty (60) days after closure. The RCRA closure certification form on Illinois EPA's internet site (www.epa.illinois.gov) must be used. Signatures must meet the requirements of 35 III. Adm. Code 702.126.

The independent engineer should be present at all critical, major points (activities) during the closure. These might include soil sampling, soil removal, backfilling, final cover placement, etc. The frequency of inspections by the independent engineer must be sufficient to determine the adequacy of each critical activity. Financial assurance must be maintained for the units approved for closure herein until the Illinois EPA approves the facility's closure certification.

The Professional Engineering Practice Act (225 Illinois Compiled Statutes 325/1-325/49) requires that any person who practices professional engineering in the State of Illinois or implies that he (she) is a professional engineer must be licensed under that Act. Therefore, any certification or engineering services which are performed for a closure plan in the State of Illinois must be done by an Illinois P.E.

Plans and specifications, designs, drawings, reports, and other documents rendered as professional engineering services, and revisions of the above must be sealed and signed by a professional engineer in accordance with Paragraph 325/14 of the Professional Engineering Practice Act.

As part of the closure certification, to document the closure activities at your facility in accordance with 35 Ill. Adm. Code 725.215, a Closure Documentation Report must be developed and submitted to Illinois EPA along with the closure certification statement. Guidance regarding the contents of this report can be found in the document referenced in Condition 3 below.

- 3. All references to the "Illinois EPA's RCRA closure plan instructions" refer to the document entitled <u>Guidance for Preparing RCRA Closure Plans</u> (July 2003). A copy of this document is available on Illinois EPA's internet site.
- 4. All references to "SW-846" refer to the USEPA document entitled <u>Test Methods for Evaluating Solid Wastes</u>, Third Edition and all finalized updates.

5. The interior of each tank must be steam-cleaned and triple rinsed. The concrete surfaces of the secondary containment system around each tank must be visually inspected, photographed and any residue adhering to the surface must be removed by scraping and/or brushing. Following this, the concrete surfaces must be steam cleaned and triple rinsed. All wash and rinse water shall be collected and managed in accordance with the requirements of (1) 35 III. Adm. Code, Subtitle G: Waste Disposal; and/or (2) 35 III. Adm. Code, Subtitle C: Water Pollution.

After cleaning the concrete surfaces, an independent licensed professional engineer shall inspect the integrity of the concrete surfaces. These surfaces shall be inspected for cracks which penetrate through the concrete surface. In addition, all construction joints must be inspected to ensure they are watertight. This inspection must be carried out in accordance with standards and recommendations of professional/technical entities such as the American Concrete Institute, the Portland Cement Association the American Society for Testing and Materials, the American Society of Civil Engineers, etc. which relate to the ability of concrete structures to contain liquids.

The results of the integrity inspection shall be: (1) documented in the form of a report; (2) submitted to the Illinois EPA; and (3) certified in accordance with 35 III. Adm. Code 702.126 by the engineer. The report must include: (1) the results of the inspection; (2) scaled drawings showing the location of all cracks and construction joints observed during the investigation; (3) conclusions reached regarding any cracks or construction joints observed in the areas of concern; (4) justification for the conclusions reached (e.g., information must be provided which indicates that any construction joints in the areas of concern are indeed watertight); and (5) photographs to support the conclusions reached.

- 6. If joints, cracks or other defects are found in the concrete during the inspection required by Condition 5 above which would potentially allow hazardous waste or hazardous constituents to migrate through them, then soil samples must be collected from beneath them to determine if hazardous waste or hazardous constituents have been released to the underlying soil. This sampling/analysis effort shall be carried out in accordance to the below listed procedures.
 - a. Samples must be collected from at least one location along each joint or crack that provides a potential for hazardous waste or hazardous constituents to migrate to underlying soil. If the crack/joint is more than 15' long, then samples must be collected from along crack/joint at 15' intervals. Such locations shall be biased to stained areas or low-lying areas where spills would tend to accumulate.
 - b. The procedures used to collect and analyze all samples shall be carried out in accordance with the procedures approved by this letter.

- c. Soil samples shall be collected from 0"-6" and from 18"-24" below the subgrade/natural soil interface at each location and analyzed for Volatile Organic Compounds (using Test Method 8260b of SW-846), Semi-Volatile Organic Compounds (using Test Method 8270 of SW-846), and the following metals: arsenic, barium, cadmium, chromium, lead, mercury, selenium and silver.
- 7. RCRA closure activities at this facility must meet the requirements of 35 Ill. Adm. Code 725 and 742.
- 8. It will be necessary to collect and analyze soil gas samples in accordance with 35 Ill. Adm. Code 742 if soil samples are required to be collected in accordance with Condition 6 above.
- 9. The following procedures must be utilized in the collection of all soil samples:
 - a. Collection of all soil samples must be carried out in accordance with ASTM or SW-846 procedures.
 - Soil samples collected for volatile organic compound (VOCs) analysis require specialized sampling and handling procedures, as specified in SW-846.
 - c. All soil encountered during the sampling effort must be field classified in accordance with ASTM D-2488.
 - d. Soil samples must be collected continuously at several locations to provide information regarding the shallow geology of the area where the investigation is being conducted.
 - e. Horizontal/vertical locations where samples are collected must be biased, as appropriate, to stained/discolored areas or areas where contamination is suspected to be present (such as the highest field screening results).
 - f. Soil which is encountered in an area where VOC contamination is a concern must be field-screened for VOCs. However, the actual samples collected for analysis at the laboratory must not be field-screened.
- 10. Quality assurance/quality control procedures which meet the requirements of SW-846 must be implemented during all required sampling/analysis efforts.
- 11. The provisions of 29 CFR 1910, cleanup operations must meet the applicable requirements of OSHA's Hazardous Waste Operations and Emergency Response standard. These requirements include hazard communication, medical surveillance, health and safety programs, air monitoring, decontamination and training. General site workers engaged in activities that expose or potentially expose them to hazardous

substances must receive a minimum of 40 hours of safety and health training off site plus a minimum of three days of actual field experience under the direct supervision of a trained experienced supervisor. Managers and supervisors at the cleanup site must have at least an additional eight hours of specialized training on managing hazardous waste operations.

The original and two (2) copies of all certifications, logs, or reports which are required to be submitted to the Illinois EPA by the facility should be mailed to the following address:

Illinois Environmental Protection Agency Bureau of Land -- #33 Permit Section 1021 North Grand Avenue East Post Office Box 19276 Springfield, Illinois 62794-9276

- 12. The approval of this closure plan will not: (a) resolve any of this facility's possible violations of the Illinois Environmental Protection Act and/or 35 Ill. Adm. Code, Subtitle G: Waste Disposal; or (b) prevent the USEPA or Illinois EPA from pursuing enforcement proceedings and monetary penalties as a result of the aforementioned possible violations.
- 13. RCRA closure activities at this facility must meet the requirements of 35 Ill. Adm. Code 725 and 742.
- 14. A completed "RCRA Interim Status Closure and Post-Closure Care Plan-General Form" must accompany all information submitted to Illinois EPA. To aid in the review of all information submitted to Illinois EPA regarding this project, please submit the original and one copy of the information.
- 15. To aid in the review of all information submitted to Illinois EPA regarding this project, please submit the original and one copy of the information.

This letter shall constitute Illinois EPA's final decision on the subject submittal. The applicant may appeal this final decision to the Illinois Pollution Control Board pursuant to Section 40 of the Act by filing a petition for a hearing within 35 days after the date of issuance of the final decision. However, the 35-day period may be extended for a period of time not to exceed 90 days by written notice from the applicant and the Illinois EPA within the initial 35-day appeal period. If the owner or operator wishes to receive a 90-day extension, a written request that includes a statement of the date the final decision was received, along with a copy of this decision, must be sent to the Illinois EPA as soon as possible.

For information regarding the request for an extension, please contact:

> Illinois Environmental Protection Agency Division of Legal Counsel 1021 North Grand Avenue East Post Office Box 19276 Springfield, IL 62794-9276 217/782-5544

For information regarding the filing of an appeal, please contact:

Illinois Pollution Control Board, Clerk State of Illinois Center 100 West Randolph, Suite 11-500 Chicago, IL 60601 312/814-3620

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Work required by this letter, your submittal(s) or the regulations may also be subject to other laws governing professional services, such as the Illinois Professional Land Surveyor Act of 1989, the Professional Engineering Practice Act of 1989, the Professional Geologist Licensing Act, and the Structural Engineering Licensing Act of 1989. This letter does not relieve anyone from compliance with these laws and the regulations adopted pursuant to these laws. All work that falls within the scope and definitions of these laws must be performed in compliance with them. The Illinois EPA may refer any discovered violation of these laws to the appropriate regulating authority.

Should you have any questions regarding this matter, please contact William T. Sinnott, II at 217/524-3310

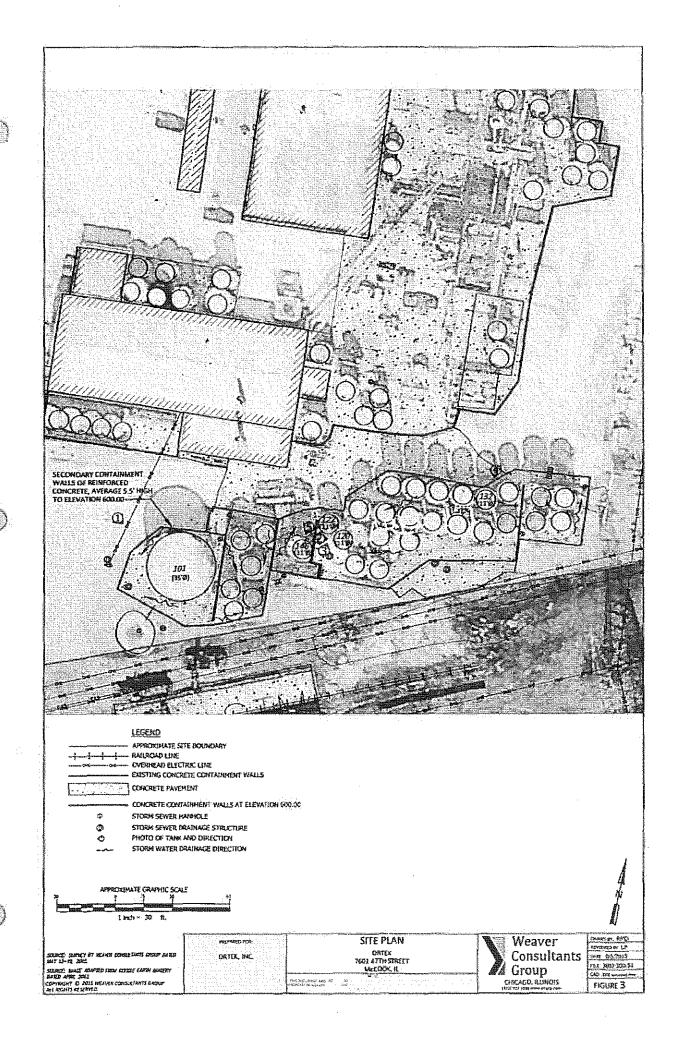
Sincerely,

Stephen F. Nightingale, P.E. Manager, Permit Section

Bureau of Land

SFN:WTS:0311740002-RCRA-C889

Attachment: Site Layout Map





ILLINOIS ENVIRONMENTAL PROTECTION AGENCY

1021 NORTH GRAND AVENUE EAST, P.O. BOX 19276, SPRINGFIELD, ILLINOIS 62794-9276 • (217) 782-2829

BRUCE RAUNER, GOVERNOR LISA BONNETT, DIRECTOR

217/524-3300

October 27, 2015

CERTIFIED MAIL 7012 0470 0001

Ortek, Inc.

Attn: Mr. Lowell Aughenbaugh, President

7601 W. 47th Street

McCook, Illinois 60525

Re: 0311740002— Cook County

Ortek, Inc.

ILD 000 646 786

Received: August 31, 2015

Log No. C-889 RCRA Closure

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Illinois Pollution Control Board, Clerk State of Illinois Center 100 West Randolph, Suite 11-500 Chicago, IL 60601 312/814-3620

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Should you have any questions regarding this matter, please contact William T. Sinnott, II at 217/524-3310

Sincerely,

Stephen F. Nightingale, P.E.

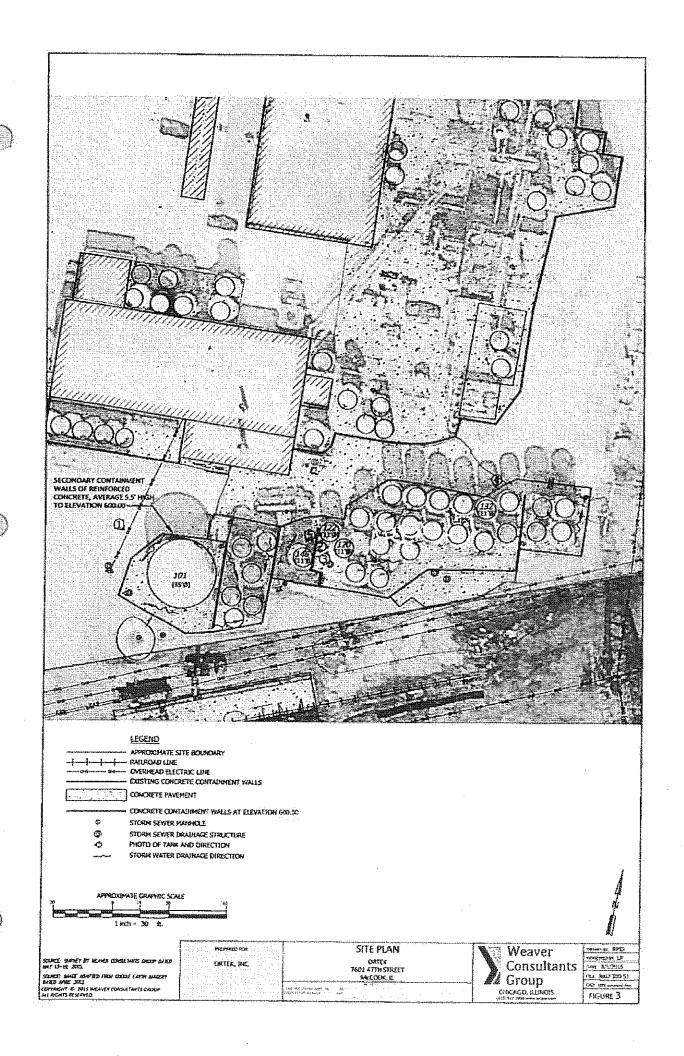
Manager, Permit Section

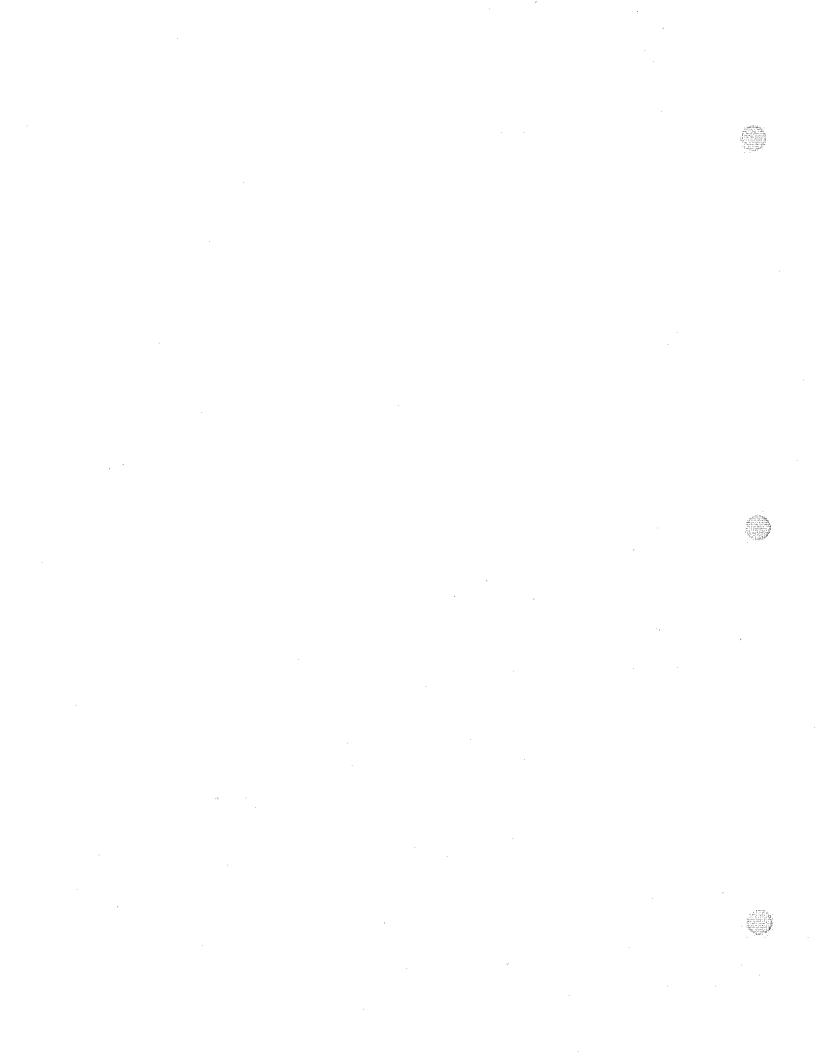
Bureau of Land

SFN:WTS:0311740002-RCRA-C889

JKM

Attachment: Site Layout Map







August 28, 2015

Illinois Environmental Protection Agency Division of Land Pollution Control -- #33 Permit Section 1021 North Grand Avenue East Post Office Box 19276 Springfield, Illinois 62794-9276

Re:

Initial RCRA Closure Plan Submittal

Ortek, Inc.

7601 W. 47th Street McCook, IL 60525

U.S. EPA ID #: ILD000646786

On behalf of our client, Ortek, Inc., Weaver Consultants Group, North Central, LLC has prepared the enclosed RCRA Closure Plan and associated form LPC-PA18. On or about January 24, 2013, the Environmental Protection Agency (EPA) sent Ortek, Inc. a Notice of Violation (NOV) identifying potential violations of RCRA Pursuant to 3005(a) of RCRA, 42 U.S.C. § 6925(a) and the regulations at 40 C.F.R. Part 270, the treatment, storage, or disposal of hazardous waste by any person who has not applied for or received a permit. This Closure Plan has been developed to document the planning, cleanout, and closure of the tanks that stored the hazardous wastes. The Closure Plan was prepared in accordance with the Illinios Environmental Protection Agency (IEPA) Guidance for Preparing RCRA Closure Plans (July 2003) document.

Project No.: 3002-300-51-01

We trust that this information is sufficient for your needs at this time. If you have any questions or require further information please contact the undersigned at 312-922-1030.

Very truly yours,

Weaver Consultants Group, North Central, LLC

Andrew S. Perdue Senior Project Manager

Enclosures:

LPC-PA18

RCRA Closure Plan

Cc: Mr. Lowell Aughenbaugh – Ortek, Inc.

Mr. Kevin Mahoney – Tressler, LLP

Mr. Brian De Varona – WCG

Mr. Brian Kennedy - USEPA



Illinois Environmental Protection Agency

Bureau of Land • 1021 North Grand Avenue East • P.O. Box 19276 • Springfield • Illinois • 62794-9276

RCRA INTERIM STATUS CLOSURE AND POST-CLOSURE CARE PLANS GENERAL FORM

LPC-PA18

This Form Must Accompany Any Rcra Interim-status Closure And/or Post-closure Care Plans Or Modification Request Submitted To The Division Of Land Pollution Control. The Original And Two Copies Of All Documents Submitted Must Be Provided.

FACILITY IDENTIFICATION (Information about the facility where the units are located which are addressed in this closure plan submittal)

Name: Ortek, Inc.	County: Cook		
Street Address: 7601 W. 47th Street	Site # (IEPA):		
City: McCook	Site No. (USEPA): <u>ILD000646786</u>		
Owner Information	Operator Information		
Name: North American Refining Company	Name: Ortek, Inc.		
Mailing Address: 7601 W. 47th Street, McCook, IL 60525	Mailing Address: 7601 W. 47th Street, McCook, IL 60525		
Contact Name: Lowell Aughenbaugh	Contact Name: Lowell Aughenbaugh		
Contact Title: President	Contact Title: President		
Phone #: (708) 762-5117	Phone #: (708) 762-5117		
(enter date)	pproval Letter pproval Letter ubmittal (Log No if known)		
Does this submittal contain groundwater information	on?		
Yes			
No.			
No			
(IF YES, PLEASE INCLUDE ONE ADDITIONAL	COPY OF SUBMITTAL)		
	•		

IL 532-2106 LPC 464 This Agency is authorized to require this information under Illinois Revised Statutes, 1979, Chapter 111 1/2, Section 1039. Disclosure of this information is required under that Section. Failure to do so may prevent this form from being processed and could result in your application being denied. This form has been approved by the

Rev. 06/03 Forms Management Center.

DESCRIPTION OF SUBMITTAL: (briefly describe what is being submitted)

Initial Closure Plan of activities to commence to properly close and disposes of five storage tanks that contained hazardous waste.

LIST OF DOCUMENTS SUBMITTED: (identify all documents in this submittal, including the cover letter)

Cover Letter, RCRA Closure Plan, LPC-PA18 Form

UNITS UNDERGOING CLOSURE (please identify what type of units are addressed in the plan, their capacities and whether they are on the RCRA Part A for the facility)

Unit	Unit Code	Number of Units Closing	Capacity	On Part A Y/N
Storage:				
Container (barrel, drum, etc.)	S01			
Tank	S02	5	varies	N
Waste Pile	S03	-		
Surface Impoundment	S04			***************************************
Treatment:		4-1-1-1-1-1-1-1-1-1-1-1-1-1-1-1-1-1-1-1		
Tank	T01			
Surface Impoundment	T02			
Incinerator	T03	\$60.0 \$40.00 \$40.00 \$40.00 \$40.00 \$40.00 \$40.00 \$40.00 \$40.00 \$40.00 \$40.00 \$40.00 \$40.00 \$40.00 \$40.00 \$40.00		A _p ulanda da la desperancia de la desperancia del desperancia de la desperancia de la desperancia de la desperancia de la desperancia del desperancia de la desperancia del desperancia del desperancia del desperancia de la desperancia del desperancia del desperancia del desperancia del dela del dela
Other (explain)	T04			
Disposal:				***************************************
Landfill	D80	•		
Land Application	D81		Tales	
Surface Impoundment	D83			

CERTIFICATION AND SIGNATURE (Must be completed for all submittals. Certification and signature requirements are set forth in 35 IAC 702.126. Any submittal involving engineering plans, specifications and calculations as defined in the Illinois Professional Engineering Practice Act (225 ILCS 325) and 68 III. Adm. Code 1380 must be signed and certified by an Illinois licensed professional engineer.)

All closure plans, post-closure plans and modifications must be signed by the person representing the owner/operator designated below or by a duly authorized representative of that person:

- 1. If the owner/operator is a Corporation By a principal executive officer of at least the level of vice-president.
- 2. If the owner/operator is a Partnership or Sole Proprietorship By a general partner or the proprietor, respectively.
- 3. If the owner/operator is a Government By either a principal executive officer or a ranking elected official.

A person is a duly authorized representative only if:

- 1. the authorization is made in writing by a person described above; and
- 2. is submitted with this application (a copy of a previously submitted authorization can be used).

CERTIFICATION STATEMENT - I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Any person who knowingly makes a false, fictitious, or fraudulent material statement, orally or in writing, to the Illinois EPA commits a Class 4 felony. A second or subsequent offense after conviction is a Class 3 felony. (415 ILCS 5/44(h))

Owner Signature _	J. 3(%	Date	8/27/2015
Title President		MAN.	
Operator Signature	<u>8. 88</u>	Date	8/27/2015
Title President		- 	
Engineer Signature (if necessary)	Bydte	Date	8/27/15
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August 28, 2015 Project No. 3002-300-51-01

RCRA CLOSURE PLAN

ORTEK, INC.

MCCOOK, ILLINOIS

Prepared For:

Ortek, Inc. 7601 West 47the Street McCook, Illinois

PREPARED BY



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ATTACHMENTS

Attachment 1- Photograph Documentation Attachment 2- Disposal Documentation

1 INTRODUCTION

1.1 Introduction

Ortek Inc. (Ortek), located at 7601 West 47th Street, McCook, Illinois (the Site) is comprised of approximately 6.2 acres of land improved with various industrial buildings and structures associated with the existing waste/used oil and glycol refining, reclaiming, and packaging operations. The Site generally lies north of the Chicago and Illinois Western Railroad and the Burlington Northern & Santa Fe Railroad, east of Joliet Road, south of 47th Street and west of Des Plaines River. A portion of the Berwyn, Illinois United State Geological Survey (USGS) 7.5-minute quadrangle map showing the Site and surrounding areas is attached as Figure 1 – Site Layout Map.

In April and May of 2011, we understand the Site received shipments of D001, D007, D008 and D039 characteristic hazardous waste. This waste was temporarily stored in tanks 101, 120, 122, 132 and 146 located in the area designated as Area 1 at the Site. Pursuant to 3005(a) of Resource Conservation Recovery Act (RCRA) 42 U.S.C. § 6925(a) and the regulations at 40 Code of Federal Regulations (CFR) Part 270, the treatment, storage, or disposal of hazardous waste by any person who has not applied for or received a permit is prohibited. In November of 2011, the generator of the hazardous material, RS Used Oil Services, Inc., removed the material from the Site. The five tanks at the Site that had previously stored the hazardous waste were subsequently emptied, decontaminated, and cleaned internally by Ortek. Currently, the Site stores various used oil and oily waste water materials and no hazardous waste. On or about January 24, 2013, the United States Environmental Protection Agency (USEPA) sent Ortek a Notice of Violation (NOV) identifying potential violations of RCRA Pursuant to 3005(a) of RCRA, 42 U.S.C. § 6925(a) and the regulations at 40 C.F.R. Part 270, the treatment, storage, or disposal of hazardous waste by any person who has not applied for or received a permit.

Although the five tanks that had previously stored hazardous waste have already been cleaned, triple rinsed, preliminary wipe sample completed, and resulting rinsate and solids have been properly disposed of as hazardous waste, recent conversations with the IEPA indicate that the facility may be required to re-clean these tanks and

implement an appropriate soil sampling and analysis program. The tanks will be closed in accordance with the measures set forth in this Closure Plan.

Of the five (5) tanks identified above four (4) of the tanks (Tanks 120, 122, 132, and 146) have not been in service since 2011. Tank 101 was put back into service after decontamination and currently stores (non-hazardous) used oil and oily waste water. This Closure Plan was developed to document the planning, investigation, activities, and final remediation effort for the tanks that previously temporarily stored the hazardous waste. The IEPA Guidance for Preparing RCRA Closure Plans (July 2003) was used for planning the cleanout and for the development of this plan.

1.2 Overall Description of Facility

1. The address, township, range, and section of the Site:

The Site is located at 7601 West 47th Street in McCook, Illinois (see **Figure 1 – Site Layout Map**). The property consists of three parcels located within the north half of the northwest quarter of Section 12, Township 38 North, Range 12 East of the Third Principal Meridian in Cook County.

2. Illinois Environmental Protect Agency (IEPA)/United States Environmental Protection Agency (USEPA) Identification Numbers:

The Site USEPA identification number is ILD000646786 and the IEPA identification number is 0311740002.

3. The type of facility based on the Standard Industrial Code of the US Department of Labor:

The Site has the Standard Industrial Code (SIC) of 5093 which identifies the Site as a scrap and waste materials facility that stores oil waste products.

4. A description of the manufacturing processes carried out at facility and products manufactured:

The Site currently uses the property for waste/used oil and glycol refining/reclaiming, oily waste water processing and packaging operations.

5. The size of facility:

The facility is comprised of approximately 6.2 acres.

6. The past operations/operational practices at facility:

According to Mr. Lowell Aughenbaugh, President of North American Refining Company (the owner of Ortek), Ortek has occupied the property since approximately 1996. Mr. Aughenbaugh indicated the property was previously occupied by Enviropur Waste Refining & Technology, Inc. (Enviropur) from approximately 1989 to 1996, by Motor Oils Refining Company (Moreco) from approximately 1952 to 1989, and by Mr. Herbert Goetsch since at least 1941 to 1952. According to Mr. Aughenbaugh, Mr. Goetsch may have independently owned and/or operated a small-scale refining operation from approximately 1939 to 1952. Mr. Aughenbaugh indicated that by 1954-1955, many of the buildings were built and the refining operations were being undertaken. An expansion occurred in approximately 1976. Based on our review of historical records, the property consisted of undeveloped land in 1938.

1. Please see Figure 2 – Site Map for the following:

- a. The layout of the facility (scale of one inch equal to no more than 200') showing Site boundaries and all hazardous waste management units and identifying those unit(s) closing; and
- b. The surrounding land use (A description of local land use, such as commercial, residential, industrial):

	Surrounding Land Use	2	
Property Name/Occupant	Address	Operation	Direction from the Site
Forest Lanes Bowling Alley	7700 West 47th Street Lyons, Illinois	Bowling Alley	North
Chicago & Illinois Western Railroad and Burlington Northern & Santa Fe Railroad	Extending Northeast and Southwest McCook, Illinois	Railroad Tracks	South

Surrounding Land Use			
Cook County Forest	Along Des Plaines River	Undeveloped Land and Levee along Des Plaines	East
Denton Cartage Company, Inc.	7701 West 47th Street McCook, Illinois	Trucking Services	West

1.3 Description of Waste Management Units

The units undergoing closure at the Site are identified as Tank 101, Tank 120, Tank 122, Tank 132, and Tank 146. The tanks are classified with the EPA unit code S02. These tanks historically stored D001 (ignitable waste), D007 (chromium), D008 (lead), and D039 (tetrachloroethyl-ene) hazardous wastes for a period of six (6) months before they were removed from the Site. The waste form codes for these chemicals are identified as W200, W202, and W204.

The following are the hazards, hazardous properties, hazardous constituents, and degradation of the waste historically stores in the waste management units:

Chromium - The health hazards associated with exposure to chromium are dependent on its oxidation state. The metal form (chromium as it exists in this product) is of low toxicity. The hexavalent form is toxic. Inhalation of hexavalent chromium compounds can result in ulceration and perforation of the mucous membranes of the nasal septum, irritation of the pharynx and larynx, asthmatic bronchitis, bronchospasms and edema. Most of the chromium in air will eventually settle and end up in waters or soils. Chromium in soils strongly attaches to soil particles and as a result it will not move towards groundwater. In water, chromium will absorb on sediment and become immobile. Only a small part of the chromium that ends up in water will eventually dissolve.

Lead - Lead compounds include a number of common high-pressure lubricants (lead soaps) and the gasoline anti-knock agents tetraethyl lead (TEL) and tetramethyl lead (TML). TEL and TML are lipid-soluble liquids of high volatility and are prepared by

chemical synthesis. Lead is one out of four metals that have the most damaging effects on human health. It can enter the human body through uptake of food (65%), water (20%) and air (15%). Other human activities, such as fuel combustion, industrial processes and solid waste combustion, also contribute. It cannot be broken down; it can only convert to other forms. Lead is a particularly dangerous chemical, as it can accumulate in individual organisms, but also in entire food chains.

Tetrachloroethyl-ene - Tetrachloroethyl-ene is widely used for dry-cleaning fabrics and metal degreasing operations. Effects resulting from acute (short term) high-level inhalation exposure of humans to tetrachloroethylene include irritation of the upper respiratory tract and eyes, kidney dysfunction, and neurological effects such as reversible mood and behavioral changes, impairment of coordination, dizziness, headache, sleepiness, and unconsciousness. EPA has classified tetrachloroethylene as likely to be carcinogenic to humans. Tetrachloroethylene is a nonflammable colorless liquid with a sharp sweet odor; the odor threshold is 1 ppm.

As required by the Illinois Environmental Protection Agency (IEPA) Guidance for Preparing RCRA Closure Plans the following information must also be included be identified in this RCRA Closure Plan:

1. Volume of each waste managed in unit, including:

a. Current volume for each waste type:

Waste Type	Volume
Chromium	0 gallons
Lead	0 gallons
Tetrachloroethyl-ene	0 gallons
D001 Waste	0 gallons

b. Maximum inventory of each waste type since first generated at Site:

These wastes were not generated at the Site. They were shipped to the Site and temporarily stored in tanks 120, 122, 132, and 146. This waste has since been shipped off-site for disposal.

Total past and total current volume:

Total past volume chromium: maximum amount: 21,300 gallons (at 21 ppm, used oil regulatory limit = 10 ppm)

Total past volume lead: maximum amount: 21,300 gallons (at 47 ppm, used oil regulatory limit = 100 ppm))

Total past volume tetrachloroethyl-ene waste: maximum amount: 21,300 gallons (at 97 ppm, used oil regulatory limit = 100 ppm)

Total past volume D001: maximum amount: 250,000 gallons (flash = 144 degrees F)

Total current volume of hazardous waste: 0 gallons

2. A description of how and where wastes are routed from the point generation to each pile

The hazardous waste was not generated at the Site. There are no hazardous waste piles on the property.

The size/volume capacity of each unit including current as well as former dimensions (if applicable);

Tank 101: 250,000 gallons; Diameter: 35 feet

Tank 120: 21,300 gallons; Diameter: 11 feet

Tank 122: 21,300 gallons; Diameter: 11 feet

Tank 132: 21,300 gallons; Diameter: 11 feet

Tank 146: 21,300 gallons; Diameter: 11 feet

4. Time period unit was used:

The tanks stored the hazardous waste for approximately six (6) months.

5. Prior use/activity in location of the HWMU (if applicable):

These tanks are located in Area 1 at the Site. These tanks have historically been used to store (non-hazardous) used oil products.

- 6. Please see Figure 3, which shows:
 - a. Dimensions of the HWMU

- b. Drains, sewers, sumps, trenches and other appurtenant structures in the HWMU and within 15 feet of the HWMU;
- c. Piping, vents, fill, waste removal, etc.
- d. Nature of surrounding operations;
- e. Secondary containment features of the HWMU;
- f. Loading/unloading area(s) associated with the HWMU;
- g. Drainage pathways around the HWMUs (direction indicated by arrows);
- h. Any significant cracks or fractured joints greater than 1/4" in thickness in the base of the HWMU;
- i. Barriers, support structures within, just outside of the HWMU;
- 7. A description of any primary or secondary containment structure associated with the HWMU:

Appropriate concrete secondary containment has been constructed in Area 1. Based on information provided by Ortek, no historic releases have occurred or been reported from these tanks.

a. A description of the material from which it is constructed (asphalt, concrete, etc.):

The tanks are single-wall metal aboveground storage tanks that sit in concrete secondary containment.

b. Integrity of surface

The current surface appears to be in good/fair condition.

c. Approximate age, date of last resurfacing:

The approximate age of the original surface is 63 years. The surface was last resurfaced in 2014 and early 2015.

d. Thickness of pad/base:

The thickness of the secondary containment concrete structure is approximately 8-inches in thickness and fiber reinforced.

- 8. A description of the material underlying the HWMU
 - The tanks lie within concrete secondary containment, however, immediately underneath the tanks comprises of a clay or clay loam soil(s).
- 9. Photographs of the tanks identified with the date the photograph was taken and the orientation of the photograph depicted are included in **Attachment 1-Photograph Documentation**.

1.4 Description of Areal Geology, Hydrogeology and Water Usage

The purpose of the topographic map review is to evaluate the presence of physical structures and/or unique topographic conditions that would be of potential importance in the event of a release or migration of a hazardous material to or from the Site. Weaver Consultants Group (WCG) reviewed the 1992 USGS Berwyn, Illinois 7.5-minute quadrangle topographic map showing the area in which the Site is located (see Figure 1). The USGS map shows that the property is at an elevation of approximately 596 feet above msl and slopes to the south and southeast. Based on the topography in the area of the property, the anticipated surface water and groundwater flow direction would be to the east, south and southeast towards the Des Plaines River located approximately 200 to 500 feet east and southeast of the property. Based on the review of certain Illinois State Geological Survey (ISGS) documents (Berg et al. 1988 and Berg et al. 1984), the Site is underlain by unconsolidated sediments consisting of discontinuous layers of silt, sand, and gravel of the Cahokia Alluvium overlying clayey and silty tills of the Wedron Formation (since reclassified as the Wedron Group (Hansel and Johnson 1996), overlying Silurian age carbonate bedrock. The Cahokia Alluvium is generally described as poorly sorted silt, clay, and silty sand with localized lenses of sand and gravel less than 20 feet thick that was deposited in floodplains and channels of present rivers and streams. Wedron Formation is described as uniform, relatively impermeable, clayey till that is estimated to be less than 20 feet thick. These sediments overlie Silurian Age dolomitic bedrock. The bedrock stratigraphy in the vicinity of the Site is composed of a thick sequence of Paleozoic sedimentary rocks that generally consist of carbonate

¹ "Till" means those unconsolidated materials deposited directly from a glacier without reworking by water (e.g., rivers or streams).

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rocks of Silurian Age near the ground surface. Published information suggests bedrock is encountered within approximately 20 to 50 feet below ground surface in the vicinity of the Site. The regional near-surface hydro stratigraphic units can be generalized into two aquifers: a shallow aquifer zone in more permeable soil (not always present) that may be present in the glacial drift, and deep aquifer in the underlying bedrock aquifers. The ISGS documents also indicate that the potential for groundwater contamination is high and is classified as "A" due to the presence of permeable alluvium (a mixture of gravel, sand, silt, and clay that are variable in composition and thickness along streams) with bedrock within 20 to 50 feet beneath the ground surface.

- An identification of any private water supply wells within a one mile radius of the Site. A scaled drawing showing the location of these wells must be provided along with actual logs and documentation of the efforts made to obtain this information:
 - The IEPA SWAP, ISGS and ISWS online water well databases were reviewed as the basis for evaluating whether any private water supply wells are located within a one mile radius. Based on this review, no apparent private water supply wells are located in a one-mile radius of the Site.
- 2. An identification of any public water supply wells within a two mile radius of the Site. A scaled drawing showing the location of these wells must be provided along with actual logs and documentation of the efforts made to obtain this information:
 - The IEPA SWAP, ISGS and ISWS online water well databases were reviewed as the basis for evaluating whether any public water supply wells are located within a two mile radius. Based on this review, no apparent public water supply wells are located within a two-mile radius of the Site.
- 3. An identification of the geologic units beneath the Site which are used for private water supply within a one mile radius of the Site (including bedrock units) and an indication of whether these units contain groundwater subject to the Class I Standards:
 - Based on the above review, the geologic units beneath the Site are not and will not be used for private water supply.

- 4. An identification of the geologic units beneath the Site which are used as a public water supply (including bedrock units) and an indication of whether these units contain groundwater subject to the Class I standards:
 - Based on the above review, the geologic units beneath the Site are not and will not be used for public water supply.

1.5 Initial Closure Activities/Waste Removal

The 2012 internal closure activities of these tanks by Ortek as hazardous waste storage units involved cleaning the tanks and removing contaminated residues. The cleanout of the tanks entailed removal of the wastes, triple rinsing with pressurized washers, and removal of rinse water. The rinse material was placed in 55 gallon steel drums for disposal. The water used to rinse the tanks along with material collected were properly contained and transported off site for disposal. The disposal documentation is included as **Attachment 2 - Disposal Documentation**. After completion of the final rinse for each tank, a visual inspection was completed by the Site personnel to ensure all waste was removed from each tank and the tanks were sufficiently clean.

1.5.1 Decontamination of Structures

The tanks, paved area surrounding the tank, equipment, structures, pipes, pumps, and sumps were subject to reasonable means of decontamination when the tanks were initially emptied of the hazardous waste material. When the tanks will be re-cleaned an independent engineer or his representative will be present during the tank cleaning. The Site will contact the Illinois EPA Field Operations Section regional office in advance of the tank closure operations so that an inspector may be present to observe these activities. The following steps will also be adhered to ensure materials involved in the decontamination activities are not contaminated:

Management of Scrapings Washwater and Rinsewater (approximately 21,000 gallons) - The tanks, underlying soils or concrete, wipe samples, and any waste material generated will be analyzed for D008 (lead), D007 (chromium), D039 (tetrachloroethyl-ene), and D001 characteristic waste as part of this tank Closure Plan. In addition, if required by the ultimate disposal facility, an analysis of this waste material will be performed to determine if it exhibits any

- of the characteristics of hazardous waste as set forth in 35 Illinois Administrative Code (IAC) 721, Subpart C. Waste material exhibiting any characteristic of a hazardous waste will be managed as a hazardous waste. At a minimum, the waste material will be managed as a special waste.
- Decontamination of Equipment All equipment and smaller tools will be scraped and washed to remove waste residues. If any residues are encountered they will managed in general accordance with the procedures set forth in Item 1 above.

1.5.2 Integrity Inspection

Tanks 101, 120, 122, 132, and 146 are static tanks currently existing within concrete secondary containment structures. At the time of the hazardous waste being stored at the Site, no releases were observed, before, during or after storage. The following steps will be followed to adhere to the IEPA Guidance for Preparing RCRA Closure Plans document:

 Concrete/Asphalt Surfaces - After cleaning the concrete/asphalt surfaces associated with the tanks, an independent registered professional engineer will inspect the integrity of the surfaces. These surfaces will be inspected for cracks which penetrate through the concrete. In addition, all construction joints will be inspected to ensure they are watertight. This inspection will be carried out in accordance with standards and recommendations of the American Society for Testing and Materials (ASTM) relating to the ability of concrete structures to contain liquids. The results of this inspection will be submitted in the form of a report within the Closure Documentation Report or submitted to the Illinois EPA in the form of a closure modification request. The integrity inspection report will include (1) the results of the inspection, (2) scaled drawings showing the location of all cracks and construction joints observed during the investigation, (3) conclusions reached regarding any cracks or construction joints observed in the areas of concern, (4) justification for the conclusions reached (e.g., information must be provided which indicates that any construction joints in the areas of concern are indeed watertight), (5) photographs to support the conclusions, and (6) certification by an independent registered engineer in accordance with 35 IAC 702.126.

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2. <u>Tank Systems</u> - The owner or operator and an independent registered professional engineer will evaluate the integrity of the tank system and its appurtenances. This inspection will be carried out in accordance with standards and recommendations of professional/technical entities such as the ASTM and the American Petroleum Institute (API).

1.5.3 Soil Sampling/Analysis Plan

Closure of tanks 101, 120, 122, 132, and 146 will require collection and analysis of soil samples to demonstrate that no hazardous wastes or hazardous constituents have been released to the soil from the tanks. If contaminants are detected in the soil within, beneath and/or around the tanks, then it may be necessary to remediate the contamination. When soil sampling/analysis is started, a plan will be developed describing the procedures which will be followed in this sampling/analysis effort. The plan, at minimum, will contain the following information:

- 1. Goals and Objectives of Effort A discussion of the goals and objectives of the soil sampling/analysis.
- Parameters to be analyzed A list of proposed parameters along with a
 discussion justifying their inclusions. The proposed parameters will include the
 materials (hazardous waste constituents) reportedly/historically stored in the
 tanks including lead, chromium, low flash point (combustible) considerations,
 and tetrachloroethyl-ene.
- 3. <u>Sampling Locations</u> A scaled map will be provided in the plan showing the location where the samples will be collected. If joints, cracks or other defects are found during the integrity inspection, then soil samples will be collected from the base of the tanks to determine if hazardous waste or hazardous constituents have been released to the underlying soil. This sampling/analysis effort will be carried out in accordance with the general procedures listed below:
 - a. Samples will be collected from at least one location along any cracks that provides a potential for hazardous waste or hazardous constituents to migrate to underlying soil.
 - b. Samples will be collected from 0"-6" below the subgrade/natural soil interface. These samples will be analyzed by an independent

laboratory, and if any hazardous waste constituents are found, additional (deeper) and wider sampling will be conducted to determine the extent of impact.

The sampling/analysis plan will describe the procedures which will be used to meet these requirements.

- 4. Soil Sampling Depth Increments The exact depths from which soil samples are to be collected will be identified in the plan. The soil sampling intervals and total depth will be dependent on several factors, including: (1) soil type and hydraulic conductivity; (2) suspected magnitude of surface contamination; (3) physical state of the waste and its mobility; (4) length of time that waste was present at the Site; (5) relative toxicity of the waste; (6) the quality of pavement; and (7) the goal of the sampling/analysis effort.
- 5. <u>Sample Collection Procedures</u> The procedures which will be used to collect the soil samples will be described in the plan.
- 6. <u>Sample Handling Procedures</u> The sampling plan will describe the procedures which will be used to store, preserve, and transport the collected soil samples to the laboratory, including chain-of-custody procedures. These procedures will be carried out in accordance with guidance in SW-846.
- 7. Analytical Procedures The sampling/analysis plan will identify the procedures which will be used to prepare the samples for analysis and to analyze them. The procedures will be carried out in accordance with those set forth in SW-846. The actual portion of the sample to be analyzed will be obtained from visually contaminated material if any is present. The procedures specified will be sufficient to analyze for all the parameters identified in the Closure Plan. The estimated quantitation limits and/or practical quantitation limits to be achieved will also be identified. It is anticipated that Method S.W. 8260, for example, be utilized for identification of Tetrachloroethene, Method EPA-6020 for chromium and Lead, S.W.-1010 for flash point, and Method EPA 9075 for total Halogens.
- 8. <u>Quality Assurance/Quality Control Procedures</u> The sampling plan describes the procedures which will be followed to ensure that the quality of the results of

the effort is acceptable, from the collection of the sample to the actual analysis of the sample. This includes the use of trip blanks, field blanks and laboratory blanks as well as the calibration and verification of the laboratory procedures and equipment utilized. The quality assurance/quality control procedures employed during a RCRA closure action will meet the guidelines set forth in SW-846. The results of soil sampling/analysis efforts will be submitted to the Illinois EPA.

1.6 Development of Remediation Objectives

The soil and groundwater (if needed) remediation objectives (ROs) for the RCRA closure project will be developed using 35 IAC 742, Tiered Approach to Corrective Action Objectives (TACO). Impacts directly attributed to the hazardous waste stored in the Tanks reference in this Closure Plan will be adequately characterized before remediation objectives are developed using the procedures set forth in TACO (35 IAC 742).

1.7 Soil Remediation

Once the Soil Sampling/Analysis Plan is developed, information regarding the procedures which will be followed to remediate soil contamination detected above remediation objectives developed will be submitted. A description of remedial alternatives that may be chosen as a means for achieving clean closure will be provided. Any alternatives selected to achieve clean closure will also be provided and described.

1.7.1 Procedures for Removing Contaminated Soil

Once soil sampling and analyses activities are completed and if soil removal is the chosen remedial action for any contaminated soil encountered at the Site, a plan will be developed to fully describe each step to be used in removing the contaminated soil. This includes a description of the equipment utilized in the removal effort; the pattern followed in removing the soil; the depth to which soil will be removed; management of the soil on-site after it is removed from the ground; loading areas; the ultimate destination of the soil; and any other steps critical to the removal effort.

1.7.2 In-situ or Ex-situ Soil Treatment

Instead of removing, transporting and disposing of contaminated soil off-site, facilities remediating soil during closure of a RCRA HWMU may also choose to treat waste on-site using in- situ or ex-situ treatment methods. Such an alternative is acceptable to the Illinois EPA, providing that the treated soil meets the remediation objectives established for the remediation effort. This treatment option will be evaluated once sampling activities are completed at the Site.

1.8 Groundwater Monitoring and Remediation

Once soil sampling activities are complete, it will be evaluated if remediation of the groundwater is necessary. The information that will be provided regarding groundwater monitoring and/or groundwater remediation will include:

1.8.1 Groundwater Monitoring

If groundwater is encountered during any soil sampling activities or soil removal effort prior to reaching soil which meets the cleanup objectives, then the Closure Plan will provide for an investigation to assess if the groundwater beneath the unit has been impacted by the unit. If groundwater is encountered, then such a plan will be submitted within sixty (60) days after the date that the analytical results are received which indicate that soil contamination extends to the water table. In addition, the Illinois EPA will be notified in writing of this discovery within fifteen (15) days after these analytical results are received. If required, the proposed groundwater investigation plan will be developed in a manner similar to that required for groundwater monitoring programs set forth in 35 IAC 724, Subpart F.

1.8.2 Groundwater Remediation Activities

Since the goal of a closure effort is clean closure and if groundwater is encountered which exceeds the applicable Tier 1 groundwater remediation objective (RO), Ortek will then take appropriate action to address the contaminated groundwater. This will include following the procedures set forth in TACO and developing site-specific ROs based upon background values, the elimination of the groundwater ingestion exposure route, Tier 2 calculations or a Tier 3 evaluation. Sufficient information will be submitted to IEPA for review and approval in support of ROs developed using any of these alternatives. Such

information will demonstrate that all the applicable requirements associated with developing the proposed ROs are met. Part of this effort may require that the Site develop and implement a groundwater remediation program. Such remediation will be sufficient to eventually meet the requirements of 35 IAC 742.

1.9 Closure/Post-Closure Care as a Disposal Unit

As discussed with the IEPA the main objective and goal is to clean the tanks, perform soil sampling activities surrounding the tanks, and close the tanks to meet the applicable EPA and IEPA requirements. Once clean closure is achieved no post-closure care will be required.

1.10 Conceptual Contingent Landfill Closure/Post-Closure Plans for Certain Tank Systems

The tanks located at the Site will not be closed as a landfill. Tanks 120, 122, 132, and 146 will be cleaned, decommissioned, and permanently closed and a clean closure performed on Tank 101 in accordance with this Closure Plan. No hazardous waste is expected to be left in place at the Site.

1.11 Schedules for Closure

35 IAC 725.213 requires the owner/operator to: treat, remove or dispose of all hazardous waste in accordance with the approved closure plan within 90 days after receiving the final volume of hazardous wastes or 90 days after approval of the Closure Plan by the Illinois EPA; and complete all closure activities in accordance with the approved Closure Plan and within 180 days after receiving the final volume of wastes. Or 180 days after approval of the Closure Plan, if that is later.

Once this Closure Plan is approved the following operations will commence immediately:

1. Per conversations with the IEPA the tanks may need to be re-cleaned, wipe sampling completed, tank removal/scraping, subsurface soil sampling efforts started, and dike/concrete integrity inspections completed. An independent engineer or his representative will be present during tank closure activities. The Site will contact the Illinois EPA Field Operations Section regional office in advance of the tank closure operations so that an

Weaver Consultants Group North Central, LLC

- inspector may be present to observe these activities. During this time, the concrete slab the tanks are located on will also be inspected for integrity.
- 2. Soil Sampling/Analysis Plan will be developed and submitted by and/or in conjunction with a geologist, environmentalist, soil scientist, soil sampling laboratory technician, and/or independent engineer or his representative.
- 3. Soil sampling activities will commence in the locations indicated in the Soil Sampling/Analysis Plan by an independent engineer or his representative. The Site will contact the Illinois EPA Field Operations Section regional office in advance of soil sampling or removal, so that an inspector may be present to observe these activities.
- 4. Tanks 120, 122, 132, and 146 will be cleaned, decommissioned, and permanently closed and a clean closure performed on Tank 101 in accordance with this Closure Plan. An independent engineer or his representative will be present during tank disposal procedures. The Site will contact the Illinois EPA Field Operations Section regional office in advance of tank removal activities so that an inspector may be present to observe these activities.

1.12 Closure Cost Estimates

Closure plans and Closure Plan modification requests should include an estimate of the cost of closing the Site in accordance with the proposed/approved plan (See 35 IAC 725.242). This estimate is based on the costs of hiring a third party to carry out the required closure activities:

Activity	Company	Cost
Labor/Equipment/Supplies to Clean each tank	RW Collins Co. Or other(s)	\$3,000/tank Estimated Total: \$15,000
Disposal Costs	RW Collins Co. Or other(s)	Estimated Total \$9,500
Independent Professional Engineer fees	Weaver Consultants Group	Estimated Total: \$9,200

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Activity	Company	Cost
Soil sampling activities (equipment)	Varies	Estimated Total: \$2,000/day
Soil sampling activities (labor)	Weaver Consultants Group	Estimated Total: \$3,600

1.13 Air Emissions (35 IAC 725.211)

It is anticipated that there will be no air emissions or nuisance problems such as dust or odors related to the cleanout of the tanks. The Site is located in a commercial/industrial area where nuisance noise is not an issue. If needed, the Site will contact the adjoining properties to inform them of the activities for the day.

1.14 Personnel Safety and Fire Prevention (35 IAC 725.211)

Occupational Safety and Health Administration (OSHA) and other safety practices will be followed to protect personnel, including contractors, involved in the operations and those who had possible exposure to hazardous waste during the cleanout. A health and safety plan will be developed for implementation of the closure activities.

1.15 Status of Facility After Closure

No treatment, storage, or disposal of hazardous waste will occur at this Site. The Site will continue to function as waste/used oil and glycol refining, reclaiming, waste water treatment and packaging operations company.

1.16 Certification/Signatory Requirements

The initial Closure Plan submittal and Closure Plan modification requests are subject to the signatory requirements of 35 IAC 702.126. The submittal must be signed as follows:

a. For a corporation: by a responsible corporate officer. For the purpose of this section, a responsible corporate officer means: A president, secretary, treasurer, or vice president of the corporation in charge of a principal

8/27/15

business function, or any other person who performs similar policy or decision making functions for the corporation.

As identified in 35 IAC 702.126(d), the following certification language must be attested to as part of the certification required above:

"I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations."

All submittals which contain engineering reports, plans, specifications and/or calculations, etc. subject to the requirements of the Illinois Professional Engineer's Act will be signed and certified by an Illinois licensed professional engineer. The engineer will also attest to accuracy and completeness of the information using the same certification statement as above. The Illinois EPA has developed the RCRA Interim Status Closure Certification Statement form which will be used to ensure that the above signatory and certifications are met. This form will be completed and accompany each Closure Plan submittal, including closure modification requests.

Owner, Mr. Lowell Aughenbaugh

"I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations."

All submittals which contain engineering reports, plans, specifications and/or calculations, etc. subject to the requirements of the Illinois Professional Engineer's Act will be signed and certified by an Illinois licensed professional engineer. The engineer will also attest to accuracy and completeness of the information using the same certification statement as above. The Illinois EPA has developed the RCRA Interim Status Closure Certification Statement form which will be used to ensure that the above signatory and certifications are met. The LPCPA-18 form will be completed and accompany each Closure Plan submittal, including closure modification requests.

Bondeter

Professional Engineer, Mr. Bryan de Varona

2 CONTENT CLOSURE PLAN (35 IAC 702.126 AND 725.215)

Once all closure activities are complete, certification of closure will be submitted to the Illinois EPA, as required by 35 IAC 725.215, by the owner/operator and an independent licensed Professional Engineer. The Illinois Professional Engineering Act (Paragraph 5101, Section 1) requires that any person who practices professional engineering in the State of Illinois or implies that he (she) is a professional engineer must be registered under the Illinois Professional Engineering Act. Therefore, any certification or engineering services which are performed for a closure plan in the state of Illinois must be done by an Illinois Professional Engineer. The certification statement will meet the requirements of 35 IAC 702.126. The closure certifications will be made once the Illinois EPA has approved the closure plan.

The independent engineer will be present at all critical activities during the closure. These include the tank cleaning activities, soil sampling activities, decontamination, soil removal (if needed), backfilling (if needed), final cover placement (if needed). The frequency of inspections by the independent engineer must be sufficient to determine the adequacy of each critical activity. A report will be developed and submitted along with the closure certification to document the completed closure activities.

3 PART A MODIFICATION AND WITHDRAWL (703.181)

The Site does not have a RCRA Part A application. Once all closure activities are completed, the Site does not plan on storing hazardous wastes at the property. The Site's closure certification and the RCRA Interim Status Closure Certification Statement will be submitted to the Illinois EPA once closure activities are complete.

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4 SUBMITTAL OF CLOSURE PLAN AND CERTIFICATIONS

The owner/operator of the Site will submit the original and two copies of all closure plans, closure modification request and PE certification of closure to the Illinois EPA. Completed LPC-PA18 forms will also accompany all information submitted to the IEPA regarding closure activities. All submittals regarding RCRA closure activities will be submitted to the following address:

Illinois Environmental Protection Agency Division of Land Pollution Control -- #33 Permit Section 1021 North Grand Avenue East Post Office Box 19276 Springfield, Illinois 62794-9276

Weaver Consultants Group North Central, LLC

5 CONTENT OF SOIL SAMPLING/ANALYSIS REPORTS

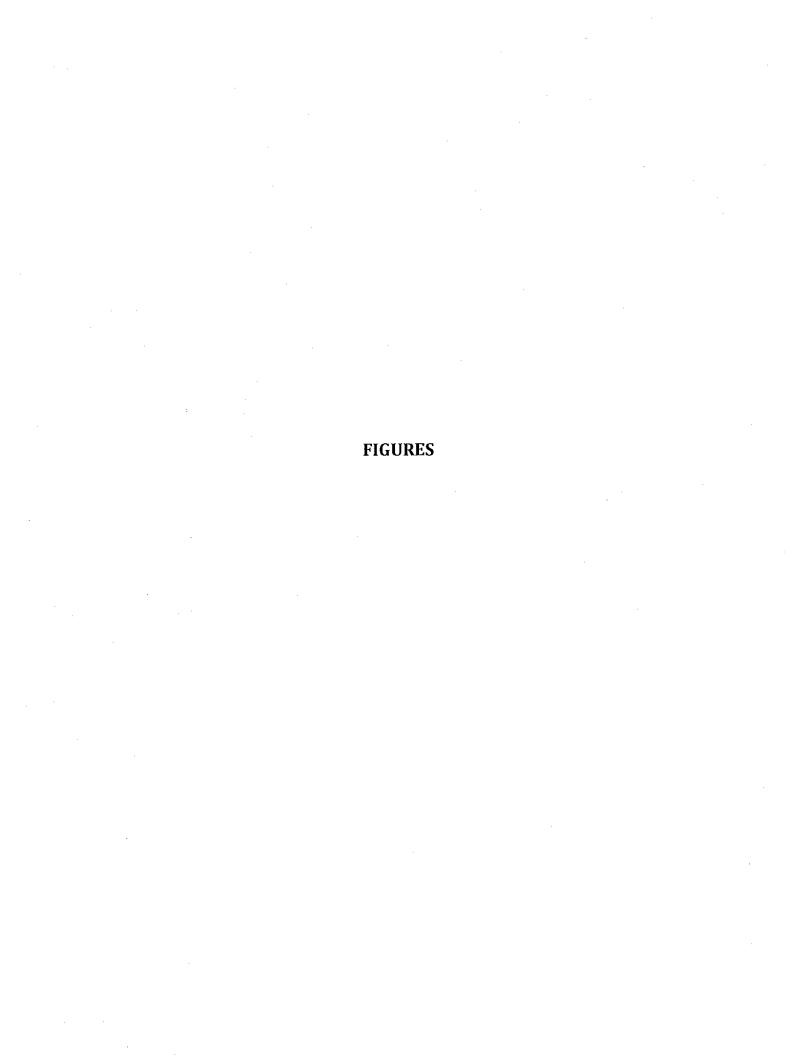
This closure project will involve the execution of soil sampling and analysis efforts. The results of such soil sampling/analysis efforts will be documented in the form of a report and submitted, as appropriate, to the Illinois EPA. The report documenting soil sampling/analysis effort will contain the information requested in the Guidance for Preparing RCRA Closure Plans (July 2003) document prepared by the Illinois EPA and information provided in this Closure Plan.

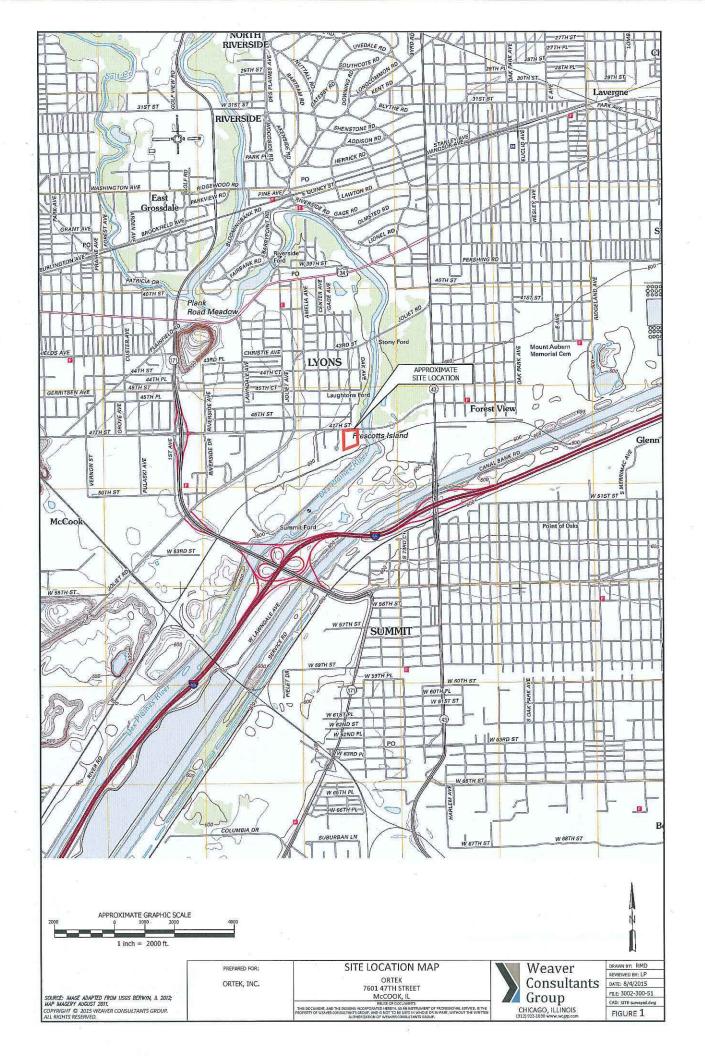
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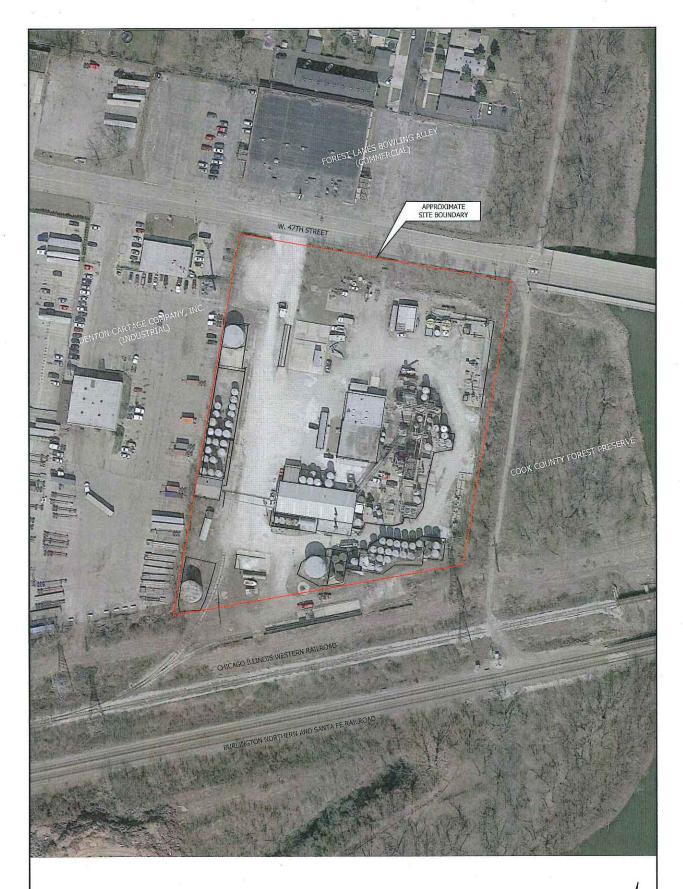
This document has been developed to provide both the USEPA and IEPA a plan to properly close out the tanks at the property that stored hazardous waste. Once this Closure Plan is approved, the following operations will commence immediately:

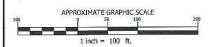
- Tanks will be cleaned to meet EPA and IEPA requirements. An
 independent engineer or his representative will be present during all tank
 cleaning procedures. The Site will contact the Illinois EPA Field Operations
 Section regional office in advance of the tank cleaning operations so that an
 inspector may be present to observe these activities. During this time the
 concrete slab the tanks are located on will also be inspected for integrity.
- 2. Soil Sampling/Analysis Plan will be developed and submitted by an independent engineer or his representative.
- 3. Soil sampling activities will commence in the locations indicated in the Soil Sampling/Analysis Plan by an independent engineer or his representative. The Site will contact the Illinois EPA Field Operations Section regional office in advance of soil sampling or removal, so that an inspector may be present to observe these activities.
- 4. Tanks 120, 122, 132, and 146 will be properly cleaned, decommissioned, and permanently closed and a clean closure performed on Tank 101 in accordance with this Closure Plan. No hazardous waste is expected to be left in place at the Site. An independent engineer or his representative will be present during tank closure procedures. The Site will contact the Illinois EPA Field Operations Section regional office in advance of closure activities so that an inspector may be present to observe these activities.

The Site will work closely with the EPA and IEPA during the development of this initial Closure Plan and during the implementation of the approved plan.









SOURCE: SURVEY BY NEAVER CONSULTANTS GROUP DATED MAY 13-19, 2015.

SOURCE: MAGE ADAPTED FROM COOGLE EARTH MAGERY DATED AFRIL 2015.
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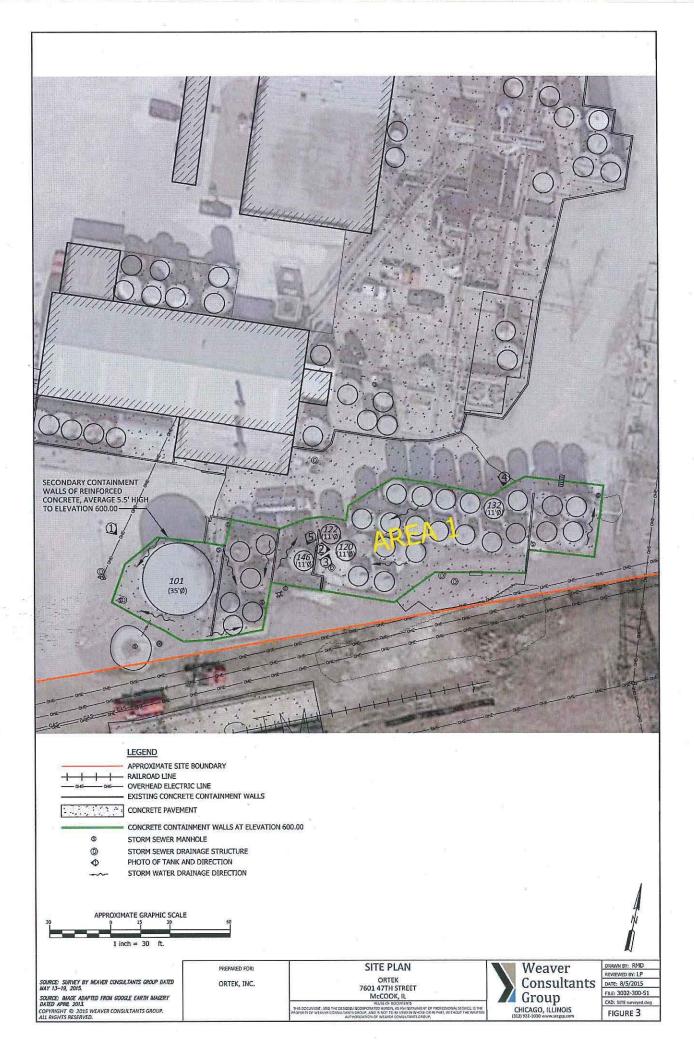
PREPARED FOR: ORTEK, INC. SITE LAYOUT MAP

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DRAWN BY: RMD REVIEWED BY: LP DATE: 8/5/2015 FILE: 3002-300-51 CAD: SITE surveyed div



ATTACHMENT 1 PHOTOGRAPH DOCUMENTATION

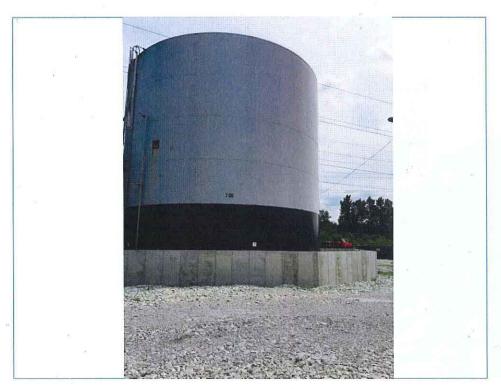


Photo 1

Tank 101- Photograph taken on August 5, 2015- facing southeast

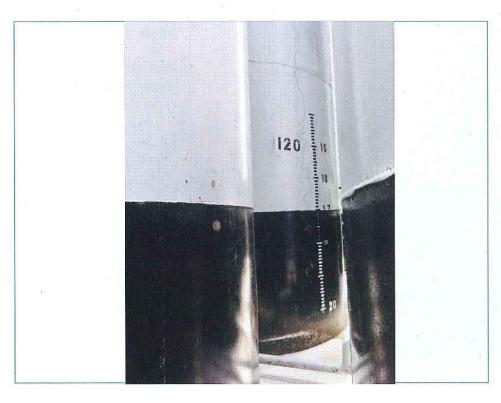


Photo 2

Tank 120- Photograph taken on August 5, 2015- facing east



Weaver Consultants Group 35 East Wacker Drive, Suite 1250 Chicago, Illinois Photos Taken: Aug 5, 2015

PHOTOGRAPHIC LOG

Ortek Inc. RCRA Closure Plan Tank Photographs McCook, Illinois

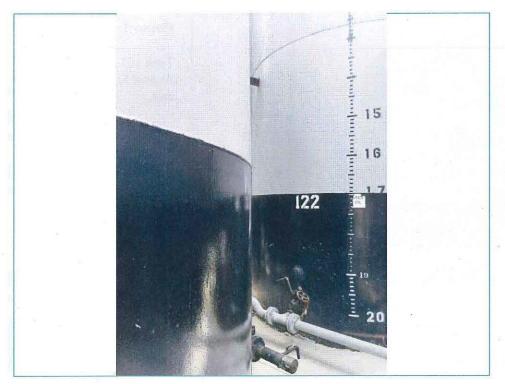


Photo 3

Tank 122- Photograph taken on August 5, 2015- facing north



Photo 4

Tank 132- Photograph taken on August 5, 2015- facing south



Photos Taken: Aug 5, 2015

PHOTOGRAPHIC LOG

Ortek Inc. RCRA Closure Plan Tank Photographs McCook, Illinois

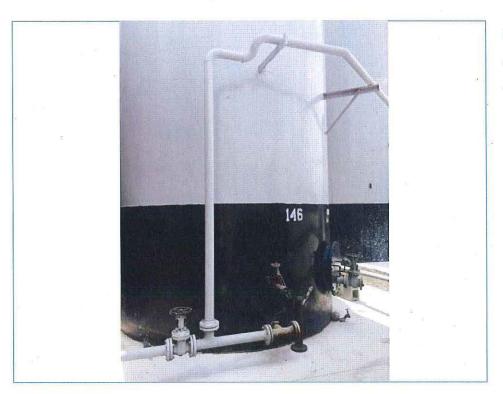


Photo 5

Tank 146- Photograph taken on August 5, 2015- facing south



Photos Taken: Aug 5, 2015

PHOTOGRAPHIC LOG

Ortek Inc. RCRA Closure Plan Tank Photographs McCook, Illinois

ATTACHMENT 2-DISPOSAL DOCUMENTATION

POLLUTION CONTROL INDUSTRIES, INC.

		LAND DISPOSAL RESTRICTION NOTIFICATION FORM 1							
Generator Name/L	ocailon_	RS .	used oil	Services	•	ر پائد د پائد		_ 01	
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PROFILE#	REGI Please dh straja	A NON- JLATED leck if waste m is not i by RCRA	RCRA WASTE CODES (Ust all that apply)	SUBCATEGORY (See Table II and Select Key if If applicable)	TREATABILITY GROUP Please check the applicable treatability group		REGULATED CONSTITUENTS FOR F001, F002 F003, F004, F005	UNDERLYING HAZARDOUS CONSTITUENTS FOR COO11, D002, D003, D004-D043	
, , , , , , , , , , , , , , , , , , ,		-		Ď	Non-wastewater Wastewater >1% TOC & >1% TSS		List all applicable constituents from key below	Lisi ali applicabje consiliuants from Table 1	
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			REGULATED CONS	STITUENTS FOR F	001, F002, F003, F0	004, F005, (for Colu	min g)		
5) Acetone 12) Cresylic Acid 19) Methanol 26 6) Benzene 13) Cyclohexanone 20) Methylene Chloride 27 7) N-Butyl Alcohol 14: 1,2-Dichlorobenzene 21) Methyl Ethyl Ketone 28 8) Carbon Disulfide 15) Ethyl Acetate 22) Methyl Isobutyl Ketone 29 9) Carbon Tetrachloride 16) Ethyl Benzene 23) Nitrobenzene 30 10) Chlorobenzene 17) Ethyl Ether 24) Pyridine 31					Toluene 1,1,1 Trichloreethu 1,1,2 Trichloroethu 1,1,2 Trichloro 1,2 Trichloroethylene Trichlorofluorome Xylene (Total)	ane 2,2 Trifiuoroethane			
I certify under per	ally of la	w that the	abova Information is	accurate and true. Print NameC	swell Aug	hen baugh	Date 8-1	6-2013	



TRADEBE TREATMENT AND RECYCLING, LLC

Profile # 18001434

GENERATOR WASTE STREAM PROFILE SHEET

High Columbia (Albitatora) Time			
ax or email completed profile sheet to:	TTR Fax: 219-397-6411	UIS Fax: 203-238-6744	usa.approvals@tradebe.com
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كالمتحدث والمتحدد			

Generator Name: RS USED 0.1 Service Customer Name: HAZCHUM Generator Address: ZS903 S Ridyal A Customer Name: HAZCHUM City: MANCC State: P Zip: Go HY City: A DU Sustainer Plane: D Zip: Go Du Customer Plane: D Zip: Go Du
Generator Address: Z5903 S Riduriol A Customer Address: Ls M Johnson State: D Zip: Gologic Contact Name: Customer Phone: Generator Phone: Customer Phone: Customer Phone: Generator Fax: Customer Email: Customer Email: Customer Email: Customer State ID # (If applicable): Generator USEPA/Federal ID #: LL
City: Mance State: 2 Zip: Co 449 City: ALC State: D Zip: 60101 Contact Name: Loci Contact Name: According to Contact Name:
Contact Name: Generator Phone: Generator Fax: Generator Fax: Generator USEPA/Federal ID #: LECTY LOCAL Customer Phone: Generator USEPA/Federal ID #: LECTY LOCAL Customer Service/Sales Rep: Generator SIC (or NAIC) Code: Generator State ID # (If applicable): Please check if generator has "No Canada Disposal" policy Please check if generator has "No Landfill" poli
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Generator USEPA/Federal ID #: LENDING Customer Service/Sales Rep: Generator SIC (or NAIC) Code: Generator State ID # (If applicable): Please check if generator has "No Canada Disposal" policy Please check if generator has "No Landfill" policy B. WASTE STREAM INFORMATION: Generator's Waste Name: TANK SUNA. Original Process Generating Waste: TANK SUNAL. Is this waste exempt from RCRA regulation? Yes No If "yes" explain or cite regulation on continuation (Example HHW, CESQG): Overal tensify in a full was thave uy. I essure y generator knowledge MISUS Sample Uther (Attach analytical, MSDS, or other supporting documentation used for waste determination) Does the Waste have any of the following characteristics? Yes (if yes check all that apply) No Oxidizer Dioxin or Suspect Water Reactive Air Reactive Organic Peroxide Hexachrome Infectious Waste Radioactive Chelating Agent Lachrymator Explosive Shock Sensitive Polymerizer Pyrophoric Inhalation Hazard, Zone C. GENERAL CHARACTERISTICS:
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Mild
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Liquid Flashpoint:<73 F73 to 99 F100 to 139 F140 to 200 F>200 FNone
Boiling Point Specific Gravity: \$13 Total Halogens: 22 % Total Organic Carbon (TOC): % Viscosity:
D. CHEMICAL COMPOSITION; Total of Maximum concentration must be > or = to 100%.
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Fel 0:1 60 10
Local The date this that art by the thousands.
Metal Pieces: Yes No If yes, Describe Metal:
Nitrocellulose: Yes No Metal Powder or Fleke: Yes No Sharps: Yes No
Isocyanates: Yes No Asbestos: (If yes, must be double bagged and wetted) Yes No Reactive cyanide: (If yes, indicate level in ppm) Yes No Range of reactive cyanide
Reactive cyanide: (If yes, indicate level in ppm) Yes No Range of reactive cyanide Reactive sulfide: (If yes, indicate level in ppm) Yes No Range of reactive sulfide
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If yes, check all SIC codes that cover operations at your facility Yes Na

WASTE WATER ANALYS		United's wastewater treatm	Profile #				
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iolvents		Chromium		Arsenic	-		
Vrsenic		Lead	•	Barlum			
Cadmium		Nickel		Sulfides		· ·	
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I. GENERATOR CERTIF I agree by afficing my authorized sign above and give Tradebe permission a Name(print):	ature that I hereby certify no consent to make amer	that the above and attached description indiments and conscitions and that I amount to the Community of the	on is complete and accurate an authorized egent of the Service Title: Date:		Maner	s, composition	
NTERNAL USE ONLY:	lease indicate wi	iich Tradebe Facility(s) are	being utilized for	his Profile			
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UNI	int or type. (Form desig FORM HAZARDOUS /ASTE MANIFEST	ned for use on elite (12 1: Generator ID Number TL POO 16774		2.Pa	· **	mergency Respons	Sec. 12. 12. 12. 12. 12. 12. 12. 12. 12. 12	4. Manifest			OMB No. 3	2050-0039
5. G P 2 M	eirerator's Name and Malli 5 Usect (11) 5 5903 S. Picto (10cc 11 50	gAddress ervices-Attr elevil Ave 449	· · · · · · · · · · · · · · · · · · ·		Gen	erator's Site Address 76/71 W 47 McCock , T	(if different the	200	ss)	14941		
Gene 6. Tri	erator's Phone: 700 ensporter 1 Company Nam to 7 (1) (3) 1 Environ	Sal-Gun) e Commutal Co	rporation				-	U.S. EPAID 11 (3-X8-	178523	À		
<u>.</u> .	ansporter 2 Company Nan		-				•	U.S. EPAID I	Number			
1	signated Facility Name ar 343 Kervicety 351 Clicaco itys Phone: (3X)	AVC.						U.S. EPAID				
9a. HM		on (including Proper Shipp	oing Name, Hazard Cla	ss, ID Number,		10, Conta No.	iners Type	11. Total Quantity	12. Unil Wt./Vol.	13.	Waste Code	1. (250).j. 5 .
*	N)S(Petro	iste Hamib Jem Distill Testivione)	ates,)		tan		G	IXXXI IXXXI	12807	4.03
	2.			12.								ere
	3.					<u> </u>	. (:	T;		73	
• 2	· 4,							· 		,		
15.	Special Handling Instruction 1. IS(X) 1. 1. 3. 4 XXXX , IX(X) 7 , IX(X) GENERATOR'S/OFFERG marked and labeled/place Exporter, I certify that the I certify that the waste mile erator's/Offerpr's Printed/Ty	OR'S CERTIFICATION: (I rded, and are in all respec contents of this consigning limization statement identi	ATE: hereby declare that the its in proper condition is	for transport according is of the attached EP/	g to applicable AAcknowledge	international and na ment of Consent r) or (b) (if I am a sn	ational governm	ental regulations	hipping nam a: If export si	e, and are cl	l am the Prim	ery .
	nternational Shipments	Import to U.S	<u> </u>	Ехр	oort from U.S.	Port of e	entry/exit:					1 1 42
17. Tran	nsporter signature (for exper Fransporter Acknowledgme) sporter 1 Printed Typed Na	nt of Receipt of Materials ima フロババ	4. 67	:	Signalui	° De	/ j				onih Oay	٠ ا اد
	sporter 2 Printed/Typed Na Discrepancy	ime			Signatu	10					onth: Day	Year:
	Discrepancy Indication Sp	ace Quantily		Туре	-	Residue Manifest Referen	ce Number:	Partial Re	ejection		☐ Full Rej	ection
	Alternate Facility (or Gane	rator)						U.S. EPA ID	Number			g fur gund speks
18c.	Signature of Alternate Fac		s (i.e., codës for hazar	dous waste treatmen	t, disposal, an	d recycling systems					fonih Da	y Year
1.	Designated Facility Owner	2.	u ter - F		3.	: :		4.			n Essentia Zon Johan Tongest	a is el la refi, s'
	Designated Facility Owner led/Typed Name	or Operator: Certification (u receipt of nazardous	materials covered by	ine maniesi Signalu		दशाः । प्रश्ने			, , , , , ,	lonth Day	/ Year

HAZCHEM ENVIRONMENTAL CORI 1115 WEST NATIONAL AVE. ADDISON, IL. 60101-3128 Phone # 630-458-1910

Invoice

DATE	INVOICE#	
10/9/2013	13-9906	

BILL TÓ:	
ORTEK ATTN: ACCOUNTS PAYABLE 7601 WEST 47TH STREET MCCOOK, IL. 60525	

SHIP TO:

R S USED OIL SERVICE
25903 S, RIDGELAND AVE.
MONEE, IL.
60449

P. O. NUMBER			TERMS	REP		SPECIAL INSTRUCTION	NS
			NET 30 DAYS	24			·
Quantity	Item Code	Description				Price Each	Amount
	01	WASTE SHIPPED TO TRAI OF INDIANA ON 09/19/13 U	DEBE TREATME INDER MANIFES	NT & RECYC ST #0005369	LING, LLC B8WAS		A CALLED TO THE CONTRACT OF TH
6	CC-300	WASTE DISPOSAL - EA. 55 GALLON DRUMS PETRO DISTILLATES/TETRACHLO		-		295.00	1,770.00
. 1	TR-100 FB-100	TRANSPORTATION ENVIRO, INS. & FUEL SUR	CHARGE			175.00 97.25	175.00 97.25
:							
	;						
						Placette galacie	
				•			
						and a second and a	

LATE PAYMENTS WILL BE ASSESSED A 2% MONTHLY FINANCE CHARGE

Total

\$2,042.25

